

National Consumer-Owned Power Wholesale Renewable Energy Credit Certification Guidelines

1 OVERVIEW

This document presents the proposed certification guidelines to support the development of a National Wholesale Tradeable Renewable Certificate (TRC) sales and trading process for consumer-owned power entities. This process will serve to certify TRCs by participating consumer-owned power entities to support wholesale TRC transactions and the marketing claims underlying the resource type, location, and quantity of the renewable energy resources associated with the TRCs.

A consumer-owned power entity is defined as a consumer- or member-owned electric utility organized to provide reliable, responsive, not-for-profit electric services; and is directly accountable to its consumers via locally elected or appointed officials. These entities are generally defined as electric cooperatives, municipalities, irrigation districts, public power/utility districts, tribal-owned facilities and power marketing agencies. For the purposes of this initiative, the term "consumer-owned power entity" is defined as any entity that is eligible for full membership in the National Rural Electric Cooperative Association (NRECA) or the American Public Power Association (APPA).

This proposed certification process does not define the term "renewable energy", and refers to guidelines established by state and federal governments or other nationally recognized standard setting bodies as necessary for trade partners to meet Renewable Portfolio Standards (RPS) or Environmentally Preferable Power (EPP) purchasing agreements. Nor does this process make any claims regarding the market value of TRCs certified. This process is solely intended to certify the claims of consumer-owned power entities seeking to market the environmental attributes of renewable energy resources via wholesale TRC transactions. The following sections detail the criteria for certifying wholesale consumer-owned power TRCs.

2 DISCLOSURE

A key element of the TRC certification process is the submittal of a "disclosure statement" by the consumer-owned power entity certifying the resource and the associated TRCs. Certification of disclosure statements will be based on disclosure statements in place or proposed for the TRC product under consideration. This statement shall include, at a minimum:

- **Generation type**
 - ♦ wind turbine
 - ♦ solar collector
 - ♦ combustion turbine
 - ♦ combined heat and power
 - ♦ hydroelectric turbine
 - ♦ fuel cell
 - ♦ stirling engine
 - ♦ Rankin cycle
 - ♦ internal combustion engine
 - ♦ other
- **Fuel / energy source**
 - ♦ wind
 - ♦ solar
 - ♦ geothermal
 - ♦ biomass
 - agricultural residues
 - animal waste
 - forest residues, wood waste
 - municipal solid waste
 - landfill gas

- ♦ water
- ♦ renewable-based hydrogen
- ♦ hybrid (specify type and percentage)
- ♦ waste heat
- ♦ other
- **Location of generation**
 - ♦ City, and/or County, or Tribe and State
 - ♦ EIA #, if applicable
- **On-line date of generation plant**
- **Date the TRCs began being generated (month and year), and**
- **Estimated/actual generation capacity and energy production.**

3 ATTESTATIONS

The following attestations are required of the generator and/or vendor of the TRCs (as noted, although they may be the same entity) in the submittal requesting certification of wholesale TRCs:

- By generator and vendor attestation, no knowledge exists of any existing or potential double counting, double selling, or double claiming of TRCs resulting from this generation resource. Note: Generator/vendor may claim it is "hosting" a renewable energy generation resource, but may not take claim to any of the TRC attributes of the resource from any TRCs sold;
- By vendor attestation, the TRCs associated with the renewable resource have not been previously sold, and if they have been previously sold by the vendor, then vendor acknowledges that no legal claims can be made regarding ownership rights of those TRCs;
- By generator attestation, the electricity associated with the TRCs was delivered into the electric power system or consumed on-site (i.e., on the consumer side of the utility meter) by an end-user, and was not marketed or otherwise represented as renewable energy;
- By generator and vendor attestation, all the environmental attributes of the renewable energy source were bundled and have not been sold off separately, and have not been double counted. Note: Any subsidies received in support of the renewable resource do not offset the environmental attributes of the resource;
- By vendor attestation, must ensure by reporting requirements and other contractual obligations with generators that any emission reduction credits or emission allowances allocated to or otherwise received by the generator for the generation output that is associated with the TRC product has not been used for compliance with any air quality requirement of local, state, or federal government;
- By generator and vendor attestation, generation output which supports the TRC product has not been used for compliance with any procurement, renewable energy portfolio standard or other renewable energy requirement of local, state or federal government. If a portion of the generation output and/or associated TRCs have been used for compliance purposes, said portion is ineligible for TRC certification, and the remaining generation output not used for compliance purposes shall remain eligible for TRC certification;
- By vendor attestation, the TRCs associated with renewable generation output have not been previously sold, and will be sold to only one customer. Note: Each time a TRC is sold the vendor must provide a new attestation;
- By vendor attestation, a description of, and contact information for, the entity or entities purchasing the TRCs has been provided to the certification entity.

4 VERIFICATION / AUDIT PROCESS

The following provisions comprise the verification and audit procedures to support the TRC certification process:

- Verification of submitted disclosure and attestation information shall take place on an annual, calendar year basis; and
- The verification process shall require that the certified provider fill out worksheets and attestations, obtain attestations from its providers and other supporting documents, and hire an independent auditor or

certified internal auditor to verify the accuracy of the information collected. The auditor shall provide a report to the certifying entity testifying to the results of the audit.

5 VINTAGE OF TRCS ELIGIBLE FOR CERTIFICATION

The following language describes the vintage of TRCs that are eligible under this certification process:

- A certified TRC product may only include TRCs that are generated in the calendar year in which the product is sold, the first six months of the following calendar year, or the last six months of the prior calendar year.